

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTWAN TURNER,

Plaintiff.

v.

AMAZON.COM SERVICES, LLC.,

Defendant.

Case No. 1:23-cv-06145

Hon. Andrea R. Wood

JOINT INITIAL STATUS REPORT

Plaintiff, Antwan Turner (“Plaintiff”), and Defendant, Amazon.Com Services, LLC., (“Defendant”), through their respective counsel, submit the following joint initial status report:

I. Nature of the Case

A. Attorneys of Record:

Mohammed Badwan, Esq
Alexander Taylor, Esq..
Sulaiman Law Group LTD.
2500 S. Highland Avenue, Suite 200
Lombard, Illinois 60148
Phone (630) 575-8181
mbadwan@sulaimanlaw.com
Attorneys for Plaintiff

None at this time
Attorneys for Defendant

B. Service:

Plaintiff is still attempting service on the Defendant.

C. Basis for Federal Jurisdiction

Plaintiff contends that this Court has subject matter jurisdiction over its Title VII claims..

D. Nature of the Claims

This lawsuit arises under the Title VII of the Civil Rights Act of 1964 and Violation of 42 U.S.C. §1981.

E. Major Legal and Factual Issues

- i. Whether the work environment was objectively and subjectively offensive;
- ii. Whether the alleged harassment complained of was based on race;
- iii. Whether the alleged conduct was either severe or pervasive;
- iv. Whether there is a basis for employer liability;
- v. Whether there was a materially adverse action taken by the employer motivated by unlawful discrimination;
- vi. Whether Plaintiff was damaged; and
- vii. Whether Plaintiff mitigated any damages

F. Relief Sought By Plaintiff:

Plaintiff seeks:

- i. Back pay and benefits;
- ii. Interest on back pay and benefits;
- iii. Front pay and benefits;
- iv. Compensatory damages for emotional pain, suffering, mental anguish and loss of enjoyment of life;
- v. Pre-judgment interest;
- vi. Injunctive relief;
- vii. Reasonable attorneys' fees and costs; and
- viii. Any other relief this Court may deem just and equitable.

II. Case Plan

A. Pending Motions

There are no pending motions.

B. State whether any defendant anticipates responding to the complaint by motion and, if so, the basis for the intended motion:

Plaintiff anticipates the Defendant will provide a response after service has been completed.

C. Proposed Discovery Plan

- i. Parties will provide a Discovery Plan upon service of the Defendant.

D. Plaintiff demands a jury trial. The parties estimate 4 to 5 days for the length of the trial.

III. Settlement

- A.** Settlement discussions occurred when Plaintiff made an initial demand however, parties were unable to resolve the matter.
- B.** The parties do not believe that a settlement conference would be productive at this time.

IV. Consent to Proceed Before a Magistrate Judge

- A.** Counsel has informed their respective clients about the possibility of proceeding before the assigned Magistrate Judge for all purposes, including trial and entry of final judgment, and the parties at this time cannot not unanimously consent to that procedure.

Dated: October 17, 2023

Respectfully submitted,

s/ Mohammed Badwan

Mohammed Badwan, Esq
Sulaiman Law Group LTD.
2500 S. Highland Avenue, Suite 200
Lombard, Illinois 60148
Phone (630) 575-8181

mbadwan@sulaimanlaw.com

Attorneys for Plaintiff